



Board of Directors Policy

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| Subject: Identity Theft Protection | | | Policy No: 515 |
| Original Issue: 10-28-08 | Last Revised: 10-27-15 | Last Reviewed: 10-27-15 | Page: 1 of 2 |

OBJECTIVE:

To help detect, prevent, and mitigate theft of member's personal identifying information and the adoption of an Identity Theft Prevention Program to implement the policy.

POLICY:

The Identify Theft Protection Policy is passed and adopted in accordance with and under the authority and direction of Federal Law and Regulations, particularly 15 U.S.C. Section 1681 and 16 C.F.R. Part 681.

- A. The General Manager bears ultimate responsibility for the development, implementation, and administration of a continuing Board of Directors-approved Identity Theft Program ("Program") consistent with the requirements of law and sound business practices.
- B. All employees with access to member information will follow the Identity Theft Program guidelines.
- C. As required by statute and regulations, the Program must include reasonable policies and procedures to:
 1. Identify relevant Red Flags (as that term is defined by federal law and regulations) for covered accounts that K.C. Electric maintains, and incorporate those Red Flags into the Program;
 2. Detect Red Flags that have been incorporated into the Program;
 3. Respond appropriately to any Red Flags that are thus detected to prevent and mitigate identity theft; and
 4. Ensure that the Program (including relevant Red Flags) is updated periodically to reflect changes in risks to members, patrons, and employees and to the safety and soundness of K.C. Electric from identity theft.
- D. In the development and subsequent administration of the Program, the General Manager is authorized and directed to:
 1. Obtain approval of the initial written Program from the Board of Directors;
 2. Train staff and employees as necessary to effectively implement the Program and exercise necessary and appropriate oversight of staff and employees to see that the Program is effectively directed and administered;
 3. Exercise appropriate oversight of K.C. Electric's independent service providers including, particularly, the accounting and billing service provider, to ensure that the activities of the service providers are conducted in accordance with reasonable

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policies and procedures to detect, prevent and mitigate the risk of identity theft; and

4. Report to the Board of Directors at least annually to (a) address material matters relating to the Program and make an evaluation of the effectiveness of the policies and procedures in addressing the risk of identity theft in connection with the opening of covered accounts, as well as with respect to existing covered accounts; (b) report with respect to service provider arrangements; (c) report any and all significant incidents involving identity theft and management’s response; and (d) make any recommendations for material changes to the Program.
- E. In carrying out this policy’s assignments and delegated duties, the General Manager is authorized and encouraged to consult and interact with K.C. Electric’s general counsel, the independent accountant, if considered appropriate, and any other business contacts and consultants reasonably available to him/her for consultation.

ACCOUNTABILITY:

General Manager

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| Attested: _____ Secretary | Date: _____ |
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